

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**No. 1:18-MJ-1776**

**ALLISTER QUINTANA,**

**Defendant.**

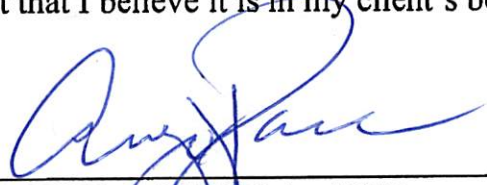
**REQUEST FOR CONTINUANCE OF GRAND JURY PRESENTMENT**

1. I am the defendant in this criminal proceeding.
2. I understand that I have a right to have my case presented to a grand jury within thirty (30) days of my arrest pursuant to 18 U.S.C. § 3161(b).
3. I hereby request a continuance of grand jury presentment for an additional period not to exceed 60 days from the date of my arrest for a total loss of 90 days. By that I mean that there be a 90 day period of excludable time for the purposes of determining compliance with the speedy indictment provision of 18 U.S.C. § 3161(b). I further request that an Order be entered affirming that this time period shall be excluded from speedy Indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).
4. Continuing the grand jury presentment will allow my attorney to attempt to negotiate a pre-indictment plea agreement with the government, whose terms may be more acceptable to me than those of an agreement entered after an indictment has been issued.

5. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to a grand jury at a later date, consistent with this waiver.

  
ALLISTER QUINTANA  
Defendant

I have reviewed the foregoing document with my client and represent to the Court that he understands it. I further present to the Court that I believe it is in my client's best interest to agree to the contents of this document.

  
ALONZO J. PADILLA, AFPD  
Attorney for Defendant

Date: June 5, 2018